

## **Confidentiality and information sharing policy within the Central Baptist Association: adopted March 26<sup>th</sup> 2019**

In the light of the new staffing structure and the new General Data Protection Regulations, it is important to set out a few guidelines regarding information sharing within the CBA, regarding safeguarding issues. This document will deal with this issue in two separate ways – the more common situation where a serious safeguarding situation arises in one of the churches that we support, or the hopefully less common way in which an allegation is made against a member of staff.

### **Handling information regarding safeguarding cases across the CBA**

#### **The ideal scenario**

A church becomes aware of a safeguarding situation and informs their DPS, who informs the CBA safeguarding officer. CBA safeguarding officer advises and supports and lets BUGB safeguarding team know if it is significant (ie involving statutory services or a minister/ministers' family). Verbal permission is gained before the regional ministers are informed that there is a significant safeguarding concern affecting the church. This can be done using a group email and then the regional ministry team can decide who is best placed to support the church. If no permission is granted then the moderator will be made aware that the safeguarding officer is advising on a significant case but the regional ministers will not. This case will take priority in oversight by peer supervision.

When regional ministers are informed it will be minimum information only e.g. you will be made aware of it being a serious allegation or the nature of the formal police charges. Again, verbal permission will be sought by the relevant parties who may be victims, congregation members with allegations against them, and ministers of the church who may not be directly involved but are leading a church where there is a significant issue. To see this process as a flowchart, please see Appendix A.

#### **The non-ideal scenario**

In order to recognise that we are all imperfect human beings and that it is often natural to call someone you know in times of stress, this sets out the flow of information sharing if a regional minister should be informed of a safeguarding incident before the CBA safeguarding lead.

Should a regional minister be in this position it is important to stop the conversation as soon as possible and offer support whilst directing them to their safeguarding lead/the CBA safeguarding lead.

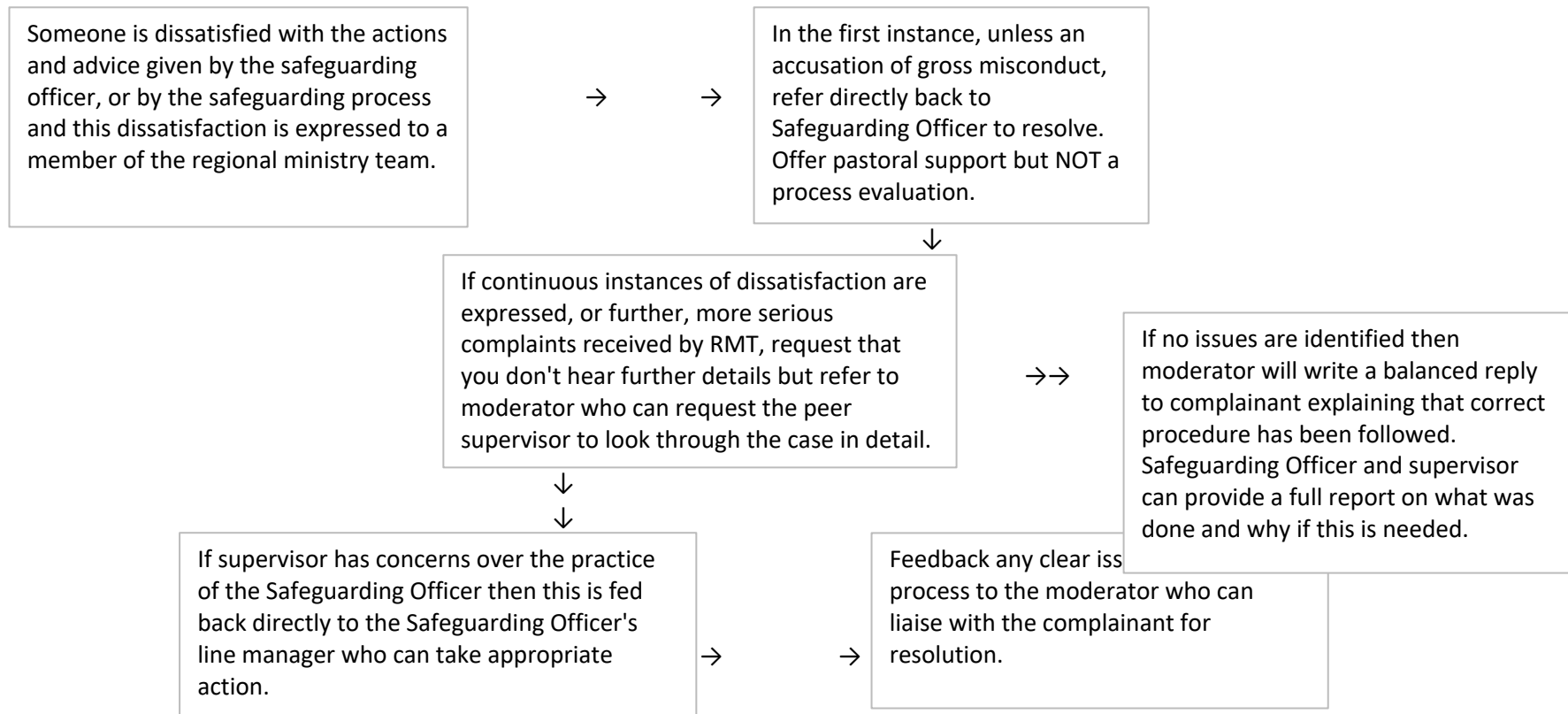
Should one of the parties relay information to the Regional Ministry Team during the process, again it is important to refer back to the safeguarding lead whilst offering pastoral support. *Remember that the Regional Ministry Team is there to support pastorally, not to evaluate the safeguarding process.* To see this process as a flowchart, please see Appendix B.

## Dissatisfaction and Complaints

This document seeks to recognise that by their very nature, safeguarding incidents cause a lot of stress for all involved and that often people feel dissatisfied with the complex processes at work and that this dissatisfaction can often form a big part of their need for pastoral support. It also recognises that dissatisfaction is not always an indicator that the processes have not been carried out properly, or that the processes themselves are at fault. Unfortunately, where there are opposing views and accounts of events, safeguarding processes will not keep everyone happy. Safeguarding processes are there to protect the vulnerable, and often have to be implemented in situations where it is impossible to know the truth of what actually happened. However, the CBA is committed to acting fairly and should the RMT receive a disclosure of procedures not being properly followed then a complaint should be raised and investigated.

Sometimes, dissatisfaction can lead to the need for the dissatisfied party to make a formal complaint. The following flowchart should make clear the process in the case of both dissatisfaction and formal complaints within the CBA.

### Dissatisfaction Flowchart



### *The Role of the Safeguarding Officer*

The Safeguarding Officer will answer questions and problems raised respectfully, giving reasoning and information where possible (information can be withheld in certain situations if statutory authorities are involved, or they directly involve another person). The Safeguarding Lead will have regular supervision including case oversight with the Peer Supervisor to ensure consistency and correct practice within cases. If a formal complaint is raised then Safeguarding Lead will inform line manager but does not need to include full details at this point. The Safeguarding Lead will notify moderator if complainant suggests any actions that may affect the CBA.

The Safeguarding Lead will also notify their line manager if an incident should come up that affects anyone they are closely and directly connected to and another suitable person will be nominated to act as Safeguarding Lead in this case.

### *The Role of the Regional Ministry Team*

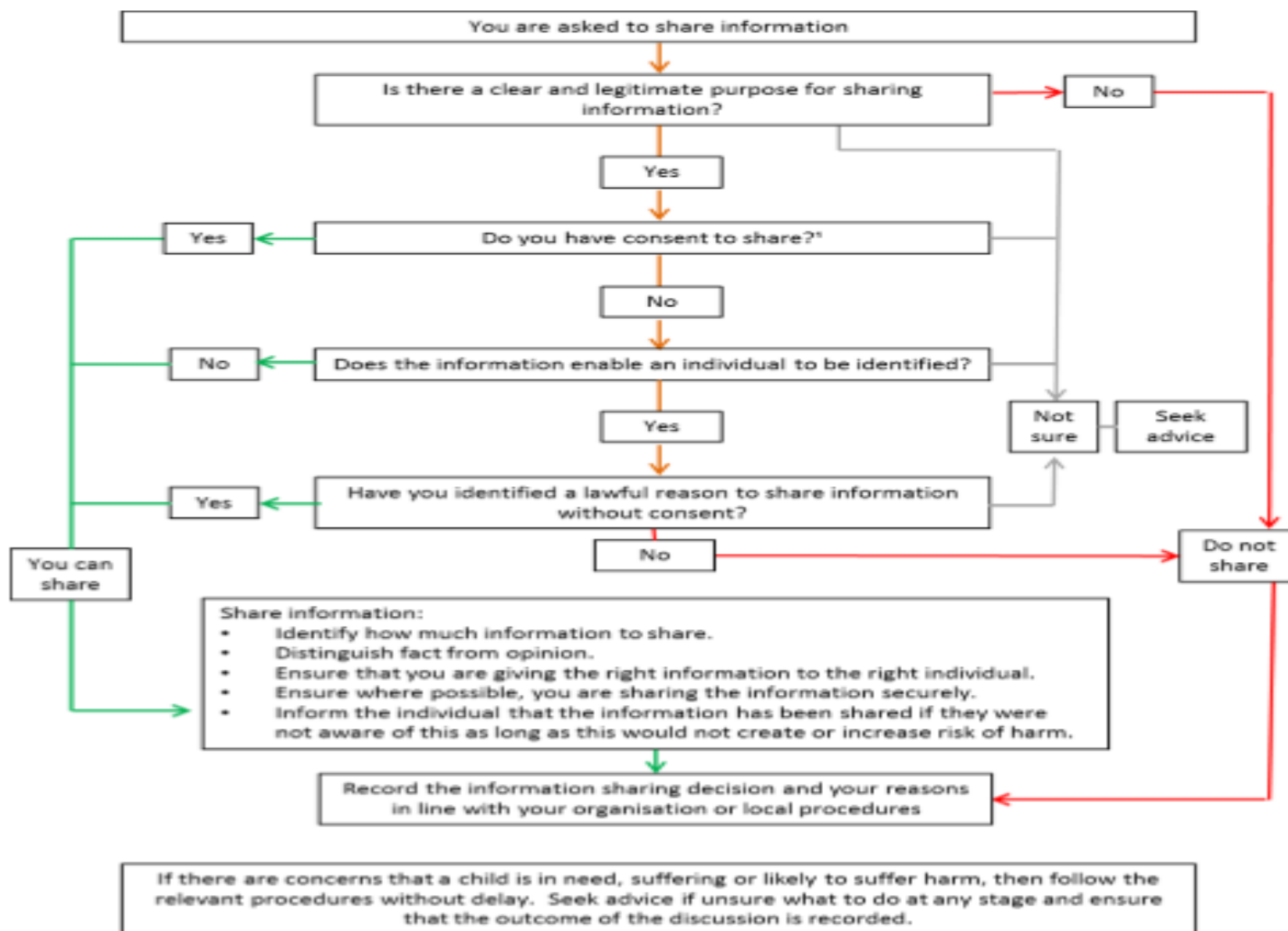
The role of the RMT is to provide pastoral support to Baptist Ministers. Should they be contacted by non-ministers regarding a known safeguarding situation, it is important to refer them back to their own minister or church DPS. Should the situation be an unknown one, then the non-ideal scenario protocol can be followed. The RMT must not offer an evaluation of the safeguarding processes, but must properly report all allegations of misconduct.

## **Confidentiality Agreements**

The CBA believes that confidentiality is both a legal requirement and is important in showing respect and preserving the dignity of anyone involved in a safeguarding incident in whatever capacity. As such we require all staff members and volunteers within the CBA, who might be privy to confidential information within the scope of the work of the association to sign a confidentiality agreement. Please see Appendix C for a copy.

## **Information Sharing and GDPR**

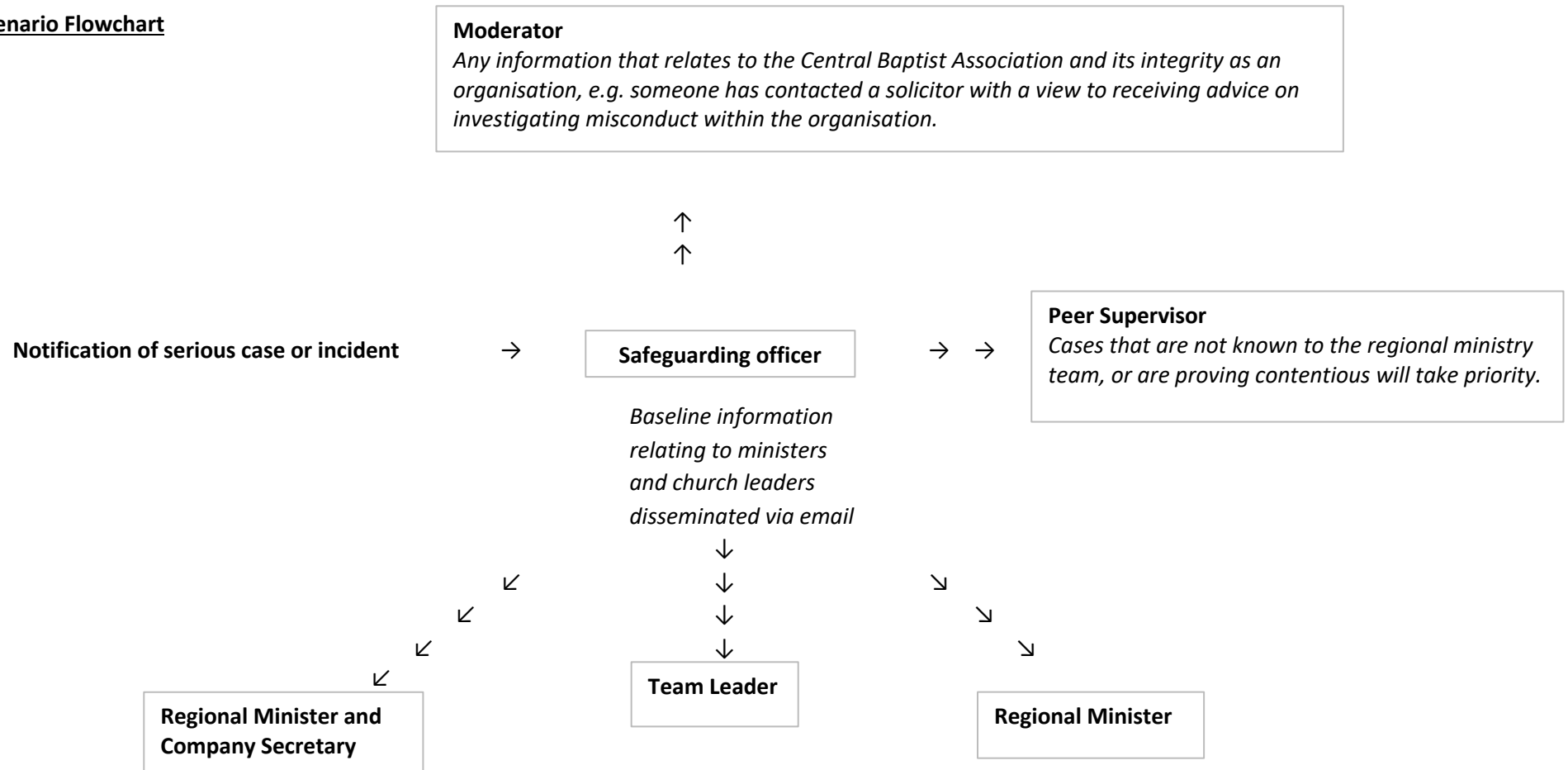
The CBA adopts the Gov.uk flowchart to determine what information can be shared and what cannot in regards to safeguarding and within the context of GDPR.



1. Consent must be unambiguous, freely given and may be withdrawn at any time

## Appendix A

### Ideal Scenario Flowchart



*Regional Ministers collectively decide who will support based on location and personal relationships*

## Appendix B

### The Non-Ideal Scenario Flow Chart



Appendix C

## Central Baptist Association

## Confidentiality Agreement

Applicable to: The CBA paid staff/employees, ministers, leaders, volunteers and others who have access to information entrusted to or maintained by Central Baptist Association, including any piece of information (verbal, digital or hard copy) that is provided to The CBA or created by The CBA regarding any person or business/organization.

The Central Baptist Association maintains information about its current and past paid staff/employees, ministers, leaders, volunteers, members, visitors and affiliates, as well as information concerning The CBA business operations and processes. The information is considered confidential or sensitive. Central Baptist Association restricts access to information for legitimate business purposes, and requires of those who have access to information: to access information solely for a legitimate business purpose as-needed, and not disclose information to any individual, group, media or organization.

- I understand that my access to confidential or sensitive information entrusted to or maintained by Central Baptist Association is approved solely in conjunction with my assigned responsibilities as a paid staff/employee, minister, leader or volunteer of Central Baptist Association and not for any other reason, particularly not for my personal benefit or for the benefit of others.
- I agree to take appropriate measures to uphold the confidentiality of this information and not divulge to anyone the contents of this information or any information provided to me, including any report or record, except in accordance with Central Baptist Association as assigned to me.
- I agree not to share any passwords with any other person, and that I am responsible for any activity carried out under my name.
- I understand that if I do not comply, I will be subject to disciplinary action up to and including termination.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Name of Ministry or Position: \_\_\_\_\_ Date: \_\_\_\_\_

Designation: (Please Check One)

☐ Employee/ Paid Staff   ☐ Minister   ☐ Leader   ☐ Volunteer   ☐ Other (please specify)